IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND NORTHERN DIVISION

*	
*	
*	Case No. 1:18-CV-00461-SAG
*	
*	
	* *

CONSENT MOTION TO EXTEND TIME FOR FILING REPLY MEMORANDUM

Defendants, through their undersigned counsel, bring this consent motion to extend the time for filing their reply memorandum and, in support thereof, state as follows:

- 1. Counsel for Plaintiffs have reviewed this motion and consent to the requested relief.
- 2. Defendants filed a motion for summary judgment on December 16, 2020. ECF 76. Plaintiffs filed an opposition on February 10, 2021. ECF 83. Defendants' reply memorandum is currently scheduled to be filed on or before March 3, 2021. ECF 79.
- 3. After Plaintiffs' filed their opposition, undersigned counsel was assigned new matters with time-sensitive deadlines, including work on an appellate brief and a dispositive motion, both due this week.
- 4. Undersigned counsel asked Plaintiffs' counsel if they would consent to a two-week extension of the time for filing a reply memorandum.
 - 5. Plaintiffs' counsel consented to the extension requested by Defendants.
- 6. A two-week extension will not cause prejudice to any party and will serve the interests of justice.

7. Defendants respectfully request an extension until March 17, 2021 to file a reply memorandum.

WHEREFORE, Defendants respectfully request that this Honorable Court modify the deadline for filing a reply memorandum until March 17, 2021, and that this Court provide any further relief as it may deem appropriate.

Respectfully submitted,

Brian E. Frosh Attorney General of Maryland

/s/ John C. Fredrickson

John C. Fredrickson Federal Bar No. 02566 Assistant Attorney General Department of General Services 300 West Preston Street, Suite 608 Baltimore, Maryland 21201 john.fredrickson@maryland.gov

Telephone: (410) 767-1825 Facsimile: (410) 333-7654

Attorneys for Defendant Col. Michael Wilson

Brian E. Frosh Attorney General of Maryland

/s/ James N. Lewis

James N. Lewis
Federal Bar No. 30220
Assistant Attorney General
Office of the Attorney General
200 Saint Paul Place, 20th Floor
Baltimore, Maryland 21202
jlewis@oag.state.md.us
Telephone: (410) 576-7005
Facsimile: (410) 576-6955

Attorneys for Defendant Sgt. Brian T. Pope

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of March 2021, a copy of the foregoing Consent Motion to Extend Time for Filing Reply Memorandum and Proposed Order were served electronically via CM/ECF to:

Cary Johnson Hansel, III, Esquire Federal Bar No. 14722 cary@hansellaw.com
Erienne Sutherell, Esquire Federal Bar No. 20095 esutherell@hansellaw.com
Justin Stefanon, Esquire Federal Bar No. 20087 jstefanon@hansellaw.com
HANSEL LAW, P.C.
2514 North Charles Street
Baltimore, Maryland 21218

Attorneys for Plaintiffs

/s/ John C. Fredrickson /s/ James N. Lewis

John C. Fredrickson James N. Lewis